

Dear Mr. Isenberg,

17 March 2005

I had the opportunity to briefly speak before the Blue Ribbon Task Force during your visit to Monterey and I wanted to follow up on my comments.

With regard to the preparation of an overall plan for the MLPA I suggested that you adhere to the principle of ecosystem management instead of looking at individual species. Let me give an example that I suspect you will have to deal with. In Monterey Bay there is a large and active squid fishery. The squid come to the shallow waters of the Bay to mate and deposit eggs. This is a one-time event in their lives and they die after the mating. You will almost surely be considering a Marine Reserve for that part of Monterey Bay near Monterey and I would expect that you will be asked to allow fishing for squid in that Marine Reserve on the grounds that the primary objective of the Reserve will be to protect the resident finned ground fish. One problem with that approach is that the squid, when they die, become an important part of the food chain in that ecosystem. If they are removed from the food chain in large numbers what does that mean for the animals that depend on squid as a source of food? Is the impact significant? Does the impact spread throughout the food chain? Those are the kinds of questions you need to consider and why I recommend that you base your decisions on ecosystem considerations.

I also suggested that you take a precautionary approach in your decision-making. Let me again give an example. We know there are serious declines in fish stocks. We think and hope that Marine Reserves will help reverse the trends. If the decision process is allowed to drag out it is reasonable to expect the situation only to get worse. The precautionary approach would be to act sooner rather than later. If a mistake is made it will be on the side of caution. The same idea would relate to defining larger Marine Reserves rather than small ones.

My third comment with regard to the overall plan was to beware of input from people who have a vested financial interest in the impacts of the MLPA. The unvarnished truth is that meaningful Marine Reserves will have a negative impact on the fishing industry in the short-term. If history demonstrates one thing with regard to fishing management it is that the fishing industry will do whatever possible to circumvent or delay management tools that would restrict their access to fish or fishing grounds or otherwise have a negative impact on the industry. That is true even when the long-term impact would be positive. I would expect the fishing industry to try to delay the process and to push for smaller reserves, fewer reserves and reserves in areas of no consequence. The former will be presented under the premise that more information is needed, that the science is not complete, etc. The latter will be promoted as "compromises".

My other comment at the hearing was on the matter of defining the "central coast". I suggested that you simply adopt the north and south boundaries of the Monterey Bay National Marine Sanctuary as the boundaries of the central coast

area. The Federal government put a lot of effort into deciding what the boundaries of the MBNMS should be including a great deal of input from the public. Using the same boundaries for the MLPA central coast would be both a defensible choice and a popular choice with the public. Moreover, as I mentioned, it would provide an immediate connection between the MLPA and the Federal authorities. Finally, by linking the MLPA to the MBNMS the program can benefit from the resources the Sanctuary puts into monitoring, research and enforcement. I am not suggesting, however, that all the Sanctuary become one large Marine Reserve.

Now is the time to act quickly on the matter of the linkage to the Sanctuary since they are in the process of drafting a new management plan. I would suggest that you have your staff meet with Sanctuary staff and get them to include some placeholders in their new management plan to allow for future cooperation with the MLPA.

Sincerely,

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